

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No. 1:22-bk-02205-HWV
RYAN J. MORRIS	:	
Debtor	:	
	:	Chapter 13
RYAN J. MORRIS	:	
Movant	:	
	:	
v.	:	
	:	
FARMERS & MERCHANTS	:	
BANK, ADAMS COUNTY TAX	:	
CLAIM BUREAU, MOUNT JOY	:	
TOWNSHIP, GETTYSBURG	:	
AREA SCHOOL DISTRICT	:	
Respondents	:	

AFFIDAVIT

This Affidavit is provided in support of Debtor's Motion to Approve Sale of Real Property Free and Clear of All Liens, Claims, Encumbrances and Other Interests with respect to certain property owned by the Debtor located at and known as 1685 Baltimore Pike, Gettysburg, Adams County, Pennsylvania.

Ryan J. Morris ("Morris" or "Debtor") being duly sworn hereby states as follows:

1. I am a Debtor in the United States Bankruptcy Court for the Middle District of Pennsylvania in Case No. 1:22-bk-02205. An Order granting the Motion to Convert to Chapter 11 Subchapter V was entered on June 13, 2023.
2. I filed a Plan of Reorganization (the "Plan") on September 7, 2023.
3. The Court has scheduled a Confirmation Hearing for October 24, 2023
4. The Plan provides that I am permitted to sell various parcels of real property but am not required to sell any parcels of real property.

5. Included among the various parcels of real estate which I own is a parcel known as and located at 1685 Baltimore Pike, Gettysburg, Adams County, Pennsylvania (the “Real Property”).

6. On August 29, 2023, I filed a Motion for Sale Free and Clear of all Liens, Claims, Encumbrances and Other Interests (the “Sale Motion”).

7. I entered into an agreement to sell the Real Property to True North Wellness Services (“Buyer”) for \$850,000.00.

8. I own various parcels of real estate in Adams County.

9. The offer from Buyer for the Real Property was negotiated at arm’s length. The Buyer was obtained through the efforts of a commercial real estate broker, NAI/CIR. The Real Property has been listed with such broker for a period of time well in excess of six months. The Real Property has been marketed extensively.

10. The Real Property was previously the subject of a sale motion and agreement of sale. Closing did not occur under such prior agreement. The prior agreement was for a price lower than that set forth in the current Motion.

11. I have no relationship with the Buyer other than this transaction. I am not related in any way to the Buyer. The Buyer is believed to be a good faith purchaser.

12. All lien holders and parties-in-interest have been provided with notice of the sale.

13. No objections have been filed to the Sale Motion.

The foregoing is set forth under the penalties of perjury.


Ryan J. Morris